



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 17 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7662 6798
RETURN RECEIPT REQUESTED

Mr. Steve Burnham
Safety Director
TWIST, Inc.
1360 Lavelle Drive
Xenia, Ohio 45385

Re: Notice of Violation
Compliance Evaluation Inspection
EPA RCRA ID No.: OHD987035326

Dear Mr. Burnham:

On July 25, 2013, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected the Twist, Inc. facility located in Xenia, Ohio. As a large quantity generator of hazardous waste, Twist, Inc. is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Twist, Inc.'s compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Twist, Inc., EPA's review of records pertaining to Twist, Inc., and the inspector's observations, EPA has determined that Twist, Inc. has unlawfully stored hazardous waste without a permit or interim status as a result of Twist, Inc.'s failure to comply with certain conditions for a permit exemption Ohio Admin. Code § 3745-52-34(A)-(C) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Twist, Inc. was out of compliance at the time of the inspection in paragraphs 1- 2, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1 - 2 are also independent TSD requirements incorporated from Ohio Admin. Code chs.

3745-65 to 68 and 3745-256. Accordingly, each failure of Twist, Inc. to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Twist, Inc. was out of compliance with the following large quantity generator permit exemption conditions:

1. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(A) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements and must take part in an annual review of this initial training thereafter. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(B) and (C) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-16(D) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, a Twist, Inc. employee hired in August 2012 had not completed the required personnel training required within six months after the date of employment or assignment to a new position. *See* employee 1780 in Table 1 on page 12 of the inspection report. Personnel training records are found in Attachment C of the inspection report.

2. Contingency Plan

All large quantity generators are required to have a contingency plan. The contingency plan must describe the actions facility personnel must take to comply with "Content of contingency plan" and the plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. This list must be kept up to date. *See* Ohio Admin. Code 3745-520-34(A)(4), 3745-65-52(A and D) [40 C.F.R. §§ 262.34(a)(4), 265.52(a and d)].

At the time of the inspection, Twist, Inc.'s contingency plan was out of date. Emergency Coordinator David Bennett was no longer employed by Twist, Inc. The current emergency coordinator was Doug Maine.

Summary: By failing to comply with the conditions for a permit exemption, above, Twist, Inc. became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. Twist, Inc. failed to apply for such a permit. Twist, Inc.'s failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-56 is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring Twist, Inc. to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 - 2, above.

USED OIL AND UNIVERSAL WASTE VIOLATIONS

3. Used Oil Requirement

Under Ohio Admin. Code § 3745-279-22(C)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, five unlabeled buckets were on the grated area labeled "used oil" over a used oil tank. See picture P7250106 on page 3 of the inspection report. The waste oil and used oil buckets were not labeled "used oil." The individual containers are required to be labeled.

4. Universal Waste Requirement

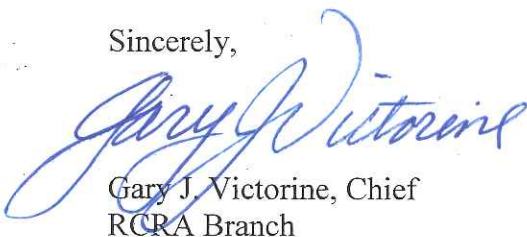
Under Ohio Admin. Code § 3745-273-13(D) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

At the time of the inspection, Twist, Inc.'s universal waste--lamps were not stored in closed containers. See pictures P7250115 and P7250116 on pages 10 and 11 of the inspection report.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with conditions 1 and 2, used oil requirement 3 above and universal waste requirement 4 above. You should submit your response to Ms. Sue Rodenbeck Brauer, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-17J, Chicago, Illinois 60604."

If you have any questions regarding this letter, please contact Ms. Sue Rodenbeck Brauer, of my staff, at (312) 353-6134 or at brauer.sue@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Pam Hull, Ohio EPA (Pam.Hull@epa.ohio.gov) (w/enclosure)
Mitch Mathews (Mitchell.Mathews@epa.ohio.gov) (w/enclosure)

Bcc: brauer.sue@epa.gov (w/enclosure)
Morris.Julie@epa.gov (w/enclosure)



U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: TWIST INC

EPA ID NUMBER: OHD987035326

ADDRESS: 1360 Lavelle Drive
Xenia, Ohio 45385

DATE OF INSPECTION: July 25, 2013

EPA INSPECTOR: Sue Rodenbeck Brauer
Environmental Scientist/Enforcement Officer

PREPARED BY:

Sue Rodenbeck Brauer April 4, 2014
Sue Rodenbeck Brauer Date
Compliance Section 2

ACCEPTED BY:

Julie A. Morris 4/7/14
Julie A. Morris, Chief Date
Compliance Section 2

Purpose of Inspection

This inspection was an evaluation of Twist Inc.'s compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) 3745-50-01 et seq. and Title 40 of the Code of Federal Regulations, Parts 260-279 (40 CFR 260-279). I performed the inspection with Ms. Pam Hull, an Inspector with Ohio Environmental Protection Agency's (OEPA's) Southwest District Office. The inspection was an EPA-led Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). For Twist Inc., the first RCRA activity in EPA's national database, RCRAInfo, is a 1994 biennial report for calendar year 1993. The most recent Twist Notification identified the North American Industrial Classification codes for the facility as 332612 and 3328, corresponding to "spring (light gauge) manufacturing" and "coating, engraving, heat treating, and allied activities," respectively. The facility was identified for inspection due to its large quantity generator status and for the "Hazardous Secondary Materials Used in Zinc Fertilizers" national sector initiative due to generation of F006 and F019.

Participants

Inspectors:

Sue Rodenbeck Brauer, Environmental Scientist, Land and Chemicals Division, Region 5 EPA
Pam Hull, Inspector, Div. of Materials and Waste Management, OEPA Southwest District Office

Site Representatives:

Josh Hartman, Process Engineer, Twist Inc.
Steve Burnham, Safety Director, Twist Inc.

Introduction

On July 25, 2013, Inspector Hull and I arrived at the Twist Inc. facility in Xenia, Ohio about 9:30 a.m. Eastern time. We waited in the large reception area at the building front. Mr. Steve Burnham arrived at 9:55 a.m. from the Jamestown, Ohio Twist Inc. plant. He was familiar with Inspector Hull from a previous inspection. I introduced myself and presented my enforcement officer credentials and a business card. Business cards are Attachment A.

I explained that I usually begin inspections with the facility describing its manufacturing processes, a site tour, and record review, possibly followed by additional review of a particular process or waste. Also, I stated that the inspection follow-up would come from U.S. EPA, not from Ohio EPA. I asked what personal protective equipment would be needed to tour the site. Mr. Burnham said only safety glasses would be needed. I informed Mr. Burnham that he should identify any confidential business information processes or documents so that the documents would be secured separately. Mr. Burnham told me that there is no CBI before the site tour.

Site Description

Mr. Burnham described the facility operations as follows. Twist Inc. makes springs and does plating. He estimated that about three-quarters of Twist Inc. business is zinc or zinc phosphate coating. There is also nickel plating. Because of the zinc initiative, I asked about the zinc content of wastes generated. Mr. Burnham said that the filter press cake has the most zinc and that zinc cobalt solution is also sent off intermittently. All of those wastes are shipped to EQ in Canton, Ohio (formerly Envirite) for hazardous waste disposal. Twist Inc. used to send some waste to AgMet in Dayton.

Twist Inc. occupies buildings with three street addresses 1430 (Plant 3), 1380 (Plant 4) and 1360 (Plant 6). The plant numbering and street addresses are shown on plant diagrams in Attachment B. The facility has an industrial wastewater pretreatment plant onsite.

Site Tour

Floor plans of each plant were provided to the inspectors. Mr. Burnham led the plant tour, starting in Plant 3 with spring manufacturing. Coils of wire are fed to coiling machines. The wire gauge used is light to heavy. After forming, the springs are heat treated in Plant 3 or 4. The springs are ground in the building that connects Plants 3 and 4. Shot peening and oil treatment is done in Plant 4. Plants 3 and 4 generate waste oil through the Vibrodyne¹ (polishing) process. Formed parts are submerged in oil with blast media. Waste oil is generated by the Vibrodyne metal finishing process. Used oil is generated by the parts oiler, gear or lube oil maintenance. There is not any oil-water separation onsite.



Picture #: P7250106

Date: July 25, 2013

Time: 10:59 a.m.

Photographer: Sue Brauer

Location: Plant 4, west end of OHF 987 035 326

Subject: The used oil sign was added to the post after a previous RCRA inspection. A used oil tank is under the grating. Product oil buckets are red. Waste oil and used oil black buckets are not labeled.

¹¹ Vibrodyne is the manufacturer of machines used to finish metal using vibration. Vibrodyne machines may be used to burnish, clean, debur, descale, finish, hone, and polish aluminum, carbon steel, carbides, brass/bronze, (<http://www.vibrodyne.com/> accessed 4/4/2014).

Pictures P7250107 (of flat, new cardboard boxes) and P7250109 (of Sue Brauer) were accidental and are purposely omitted from this report.



Picture #: P7250110

Date: July 25, 2013

Time: 11:09 a.m.

Photographer: Sue Brauer

Location: OHD 987 035 326, Plant 4, west end.

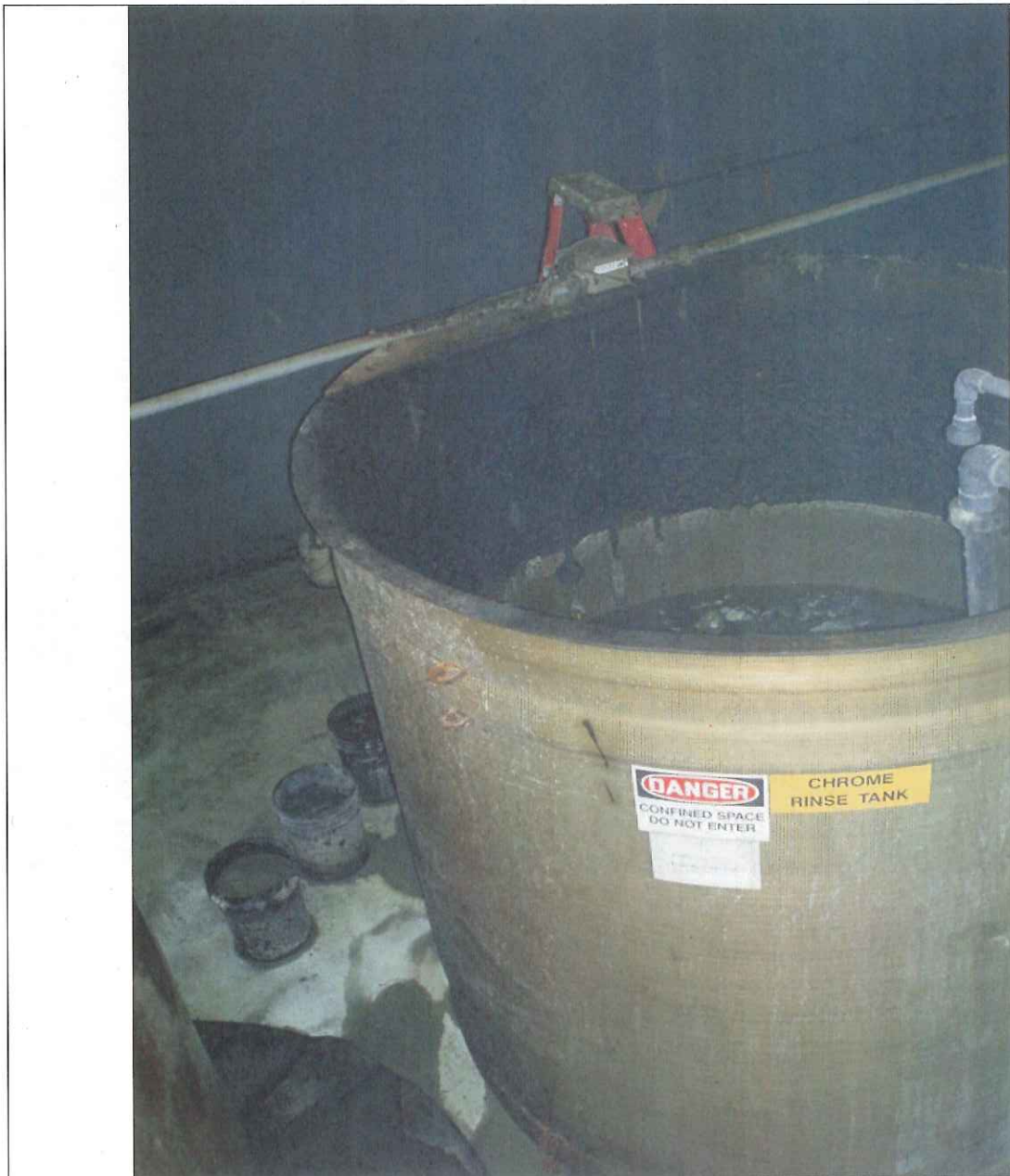
Subject: This is the opposite view of the buckets shown in P725106. Note the absence of "used oil" labeling.

The site tour proceeded to the plating lines in Plant 6 and the onsite wastewater pretreatment plant. The wastewater pretreatment is in a confined space entry area. We observed the tanks and I saw three buckets next to the chrome waste tank.



Picture #:
P7250110
Date: July
25, 2013
Time: 11:09
a.m.
**Photograph
er:** Sue
Brauer
Location:
OHD 987
035 326,
west end of
Plant 6 lower
level

Subject:
Wastewater
pretreatment
plant, from
left to right.
Waste acid
cond. tank



Picture #:
P7250111
Date: July
25, 2013
Time: 11:09
a.m.
**Photograph
er:** Sue
Brauer
Location:
OHD 987
035 326,
west end of
Plant 6
lower level
Subject:
Wastewater
pretreatment
plant, from
left to right.
Chrome
rinse tank.
Note
buckets.



Picture #: P7250112

Date: July 25, 2013

Time: 11:09 a.m.

Photographer: Sue Brauer

Location: OHD 987 035 326, west end of Plant 6, lower level

Subject: Wastewater pretreatment plant, left to right. Waste alkaline conc. tank



Picture #: P7250113

Date: July 25, 2013

Time: 11:10 a.m.

Photographer: Sue Brauer

Location: OHD 987 035 326, west end of Plant 6, lower level.

Subject: Different exposure of P7250112. Waste alkaline conc. tank, same tank as in P7250112.



Picture #: P7250114

Date: July 25, 2013

Time: 11:09 a.m.

Photographer: Sue Brauer

Location: OHD 987 035 326, west end of plant 6.

Subject: Wastewater pretreatment system, acid alkaline rinse tank.



Picture #: P7250115

Date: July 25, 2013

Time: 11:45 a.m.

Photographer: Sue Brauer

Location: OHD 987 035 326, north side of Plant 6, east of center.

Subject: Universal waste lamps are not stored in closed containers. See next photo for Universal Waste outline on floor. Posted: "Universal Waste Storage Area" The lamps are a mixture of green and silver caps.



Picture #: P7250116
Date: July 25, 2013
Time: 11:45 a.m.
Photographer: Sue Brauer
Location: OHD 987 035 326, north side of plant 6 east of center.
Subject: Universal Waste is accumulated in a teepee fashion. The boxes are not closed. The lamps are both green and silver capped.

Records Review

I requested these records to review:

- manifests for the past three years
- hazardous waste reports
- contingency plan
- training records for hazardous waste management
- container area inspection
- tank inspection
- emergency equipment inspection logs

- waste determinations
- last shipment of universal waste offsite
- closure documentation.

Twist Inc had not closed any hazardous waste accumulation areas since its last inspection so no closure documentation was available. The last shipment of universal waste lamps was on December 19, 2012. There are no tanks of hazardous waste onsite. We reviewed offsite shipments records. Heritage-Crystal Clean LLC picked up “oily water” on October 18, 2012, November 17, 2012, and April 25, 2013. I placed less emphasis on waste analysis records, manifests, and land disposal restriction notifications (LDR) because some wastestreams are listed hazardous wastes, and manufacturing processes have not changed.

The contingency plan was out of date. Emergency Coordinator David Bennett was no longer employed by Twist Inc. The current manager is Doug Maine. Doug Maine’s name was not in the contingency plan I reviewed.

I requested the training records and job descriptions for employees who handle the wastewater treatment sludge and sign manifests. Mr. Burnham provided records for four employees, one of whom was hired in August 2012. The new employee had not received classroom or on-the-job training that taught him to perform his duties in a way that ensures the facility’s compliance with the hazardous waste requirements applicable to large quantity generators. *Mr. Burnham asserted a confidential business information claim for the “Job Classification Report (without Names)” printed on July 25, 2013.* Copies of personnel training records are Attachment C.

Table 1. RCRA Training Spot Check

Employee Clock Number	Hazardous Waste Management 2 years ago	Hazardous Waste Management last year	Most Recent Hazardous Waste Management
1780	Not Twist employee	Aug – Dec none	none
1177	12/08/2011	12/18/2012	07/25/2013
253	12/08/2011		Former employee
319	12/19/2011	12/18/2012	07/25/2013

While Mr. Burnham was copying other records, I photographed the Waste Disposal section (five pages) from a Twist Inc training document. The classroom or on-the-job training teaches the facility personnel to perform their duties in a way that ensures the facility’s compliance with the interim status standards for owners and operators of hazardous waste treatment and storage facilities applicable to LQGs. For Twist Inc in Xenia, those interim status standards include Subpart C Preparedness and Prevention, Subpart D Contingency Plan and Emergency Procedures, Subpart I Use and Management of Containers and Subparts AA, BB, and CC for volatile organic air emissions from process vents, hazardous waste equipment leaks, and containers. The job descriptions must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position. The Universal Waste rule and the Used Oil Management Standards are not called out in the Personnel training rule. However, the purpose of a RCRA contingency plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of

hazardous waste or hazardous waste constituents to air, soil, or surface water. Universal waste and used oil frequently contain hazardous constituents.

4.0 WASTE DISPOSAL

All hazardous waste must be disposed at a hazardous waste disposal facility, which is permitted for that waste. To help ensure that the disposal facility is legitimate, the following information should be obtained:

1. EPA Identification Number
2. Copy of Disposal Facility's Permit.
3. Certification that disposal facility meets the financial requirements for closure and post-closure, i.e. copies of insurance policy, letter of credit, etc.

A visit to the disposal facility is highly recommended.

To aid in preparing waste material for transportation and disposal, see Section 5.4 WASTE TRANSPORTATION CHECKLIST.

4.1 SITE-SPECIFIC WASTE

Presently, Twist Inc. produces the following hazardous waste for off-site disposal.

OFF-SITE DISPOSAL Hazardous Waste

<u>Waste I.D.</u>	<u>Physical State</u>	<u>Hazardous Property</u>	<u>EPA Hazardous Waste Number</u>
Waste Combustible Liquid (LEA 571 Oil)	Liquid	Flammable	D001
Wastewater Treatment Filter Press Cake (Plt. 6)	Solid	Metals	F019, D006, D007 & F006
Waste Paint Related Materials	Liquid	Flammable	D001, D035, F002 F003 & F005
Zinc Black Oxide/ Zinc Phosphate Sludge	Semi-solid	Corrosive	D002

*Wastes restricted from land disposal by U.S. EPA (40 CFR 268).

Picture #:
P7250117
Date: July
25, 2013
Time: 2:18
p.m.
Photographer: Sue
Brauer
Location:
Conference
room, OHD
987 035 326
Subject:
First page
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"Waste
Disposal"

Twist Inc. does produce other waste materials, but these are treated by Twist's wastewater pretreatment system. This is not considered as treatment of hazardous waste, per 40 CFR 264.3 (g), since these waste materials are considered part of an elementary neutralization unit or a wastewater treatment unit as defined by 40 CFR 260.10. These wastes included metal-bearing acids and alkalis (caustics).

Presently, Twist Inc. produces the following non-hazardous waste for off-site disposal:

OFF-SITE DISPOSAL
Non-Hazardous Waste

<u>Waste I.D.</u>	<u>Physical State</u>
Waste Oil (Recycled)	Liquid
Grinding/Blast Dust Collector Waste (Recycled)	Solid
Waste E-Nickel Solution (Recycled)	Liquid
Waste E-Nickel Strip Solution (Recycled)	Liquid
Wastewater Treatment Filter Press Cake (Pit 4)	Solid
Zinc Phosphate Sludge	Solid
Acid Zinc Filter Media	Solid
Spent Zinc Nickel Filter Media	Solid
Spent Zinc Cobalt Filter Media	Solid
Spent Alkaline Copper Filter Media	Solid
Spent E-Nickel Bag Filter Media	Solid

(Note: Approval of this material assumes no free liquids present)

4.2 GENERAL WASTE DETERMINATION

Whenever a new waste material is generated, the Consulting Engineer should be contacted in order to determine the analysis required for hazardous characterization.

4.21 Hazardous Waste

Certain waste are specifically listed as hazardous under U.S. EPA Regulations (40 CFR261, Subpart D) and Ohio EPA Regulations (OAC 3745-51-30 to33).

If a waste is not a RCRA listed hazardous waste under 40 CFR261, Subpart D, it may be characterized as RCRA hazardous if it exhibits one or more of the following characteristics in Table 1.

Picture #:

P7250118

Date: July

25, 2013

Time: 2:18

p.m.

Photograph

er: Sue

Brauer

Location:

Conference

room, OHD

987 035 326

Subject:

Second page

copied from

"Waste

Disposal."

Note the use

of "Waste

Oil" instead

of "Used

Oil."

TABLE 1*

<u>Hazardous Waste Characteristic</u>	<u>U.S. EPA Haz. Waste No.</u>	<u>General Description</u>
Ignitability	D001	A waste that has a flash point of less than 140°F as determined by a specified closed cup test or is an oxidizer or liquid that is capable of causing fire through friction at standard temperature and pressure.
Corrosivity	D002	A liquid waste that has a pH less than or equal to 2, or greater than or equal to 12.5, or corrodes steel at a rate greater than 6.35mm (1/4 inch) per year at a test temperature of 130°F.
Reactivity	D003	A waste that is normally unstable, or reacts violently, forms potentially explosive mixtures or generates toxic gases or fumes when mixed with water. Is a cyanide or sulfide bearing waste when exposed to high or low pH can generate toxic fumes. Is capable of detonation if heated or at standard temperature and pressure.
Toxicity Characteristic+	D004 & D043	A waste which when extracted from a representative sample contains any of the following contaminants at a concentration equal to or greater than the respective values listed on the next pages.

+Toxicity Characteristic Leaching Procedure (TCLP) replaces E.P. Toxicity as a hazardous waste characteristic – effective September 28, 1990.

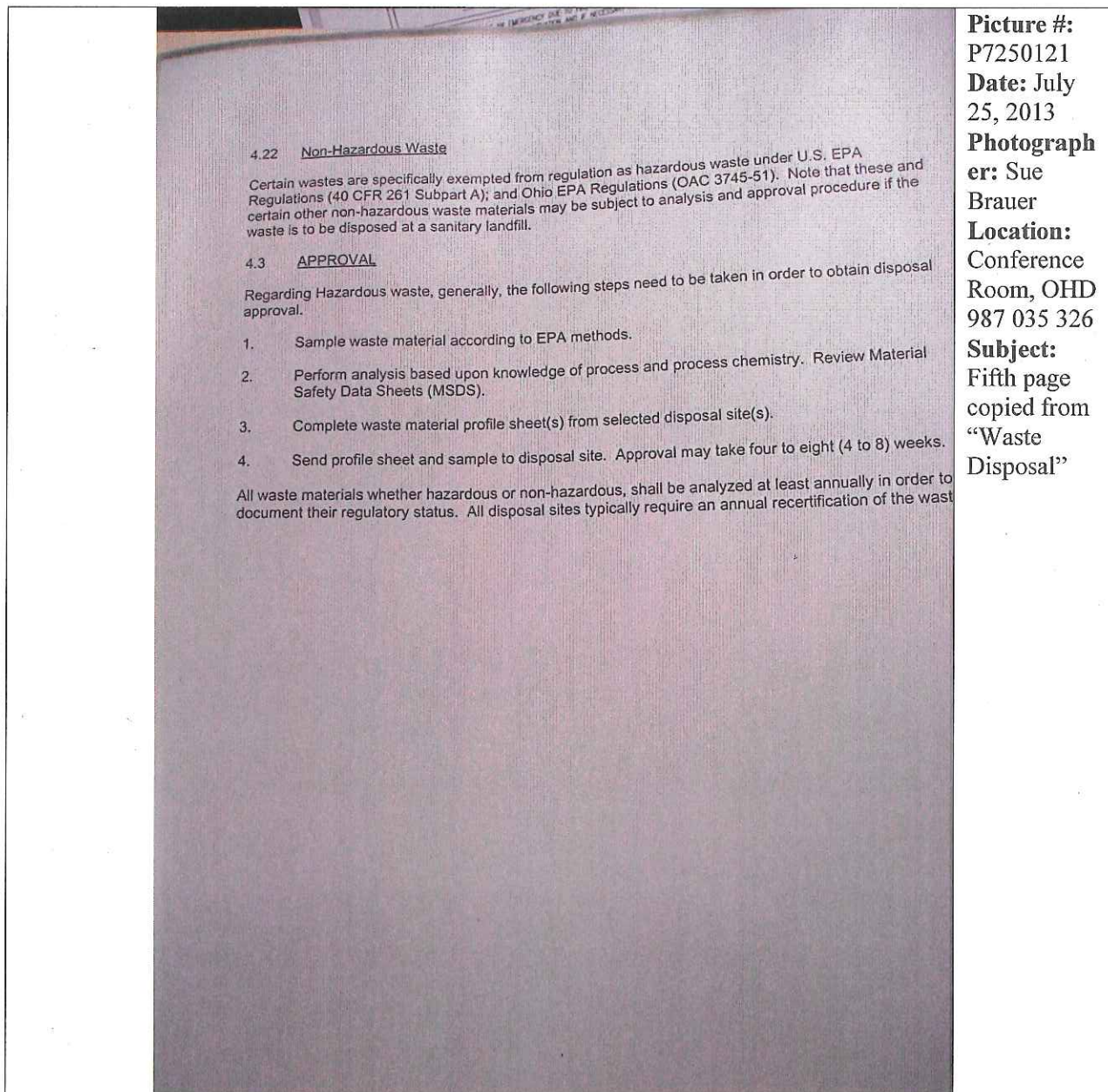
*Table 1 is partial and does not include all the criteria for determining if a waste is hazardous. For complete definitions reference 40 CFR 261 Subpart C.

Picture #:
P7250119
Date: July
25, 2013
Time: 2:19
p.m.
Photographer: Sue
Brauer
Location:
conference
room, OHD
987 035 326
Subject:
Third page
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"Waste
Disposal."
The
ampersand
between
D004 and
D043 should
be a hyphen
since the
General
Description
is for all the
toxicity
characteristic
hazardous
constituents.

TOXICITY CHARACTERISTIC *

Contaminant	U.S. EPA Haz. Waste No.	Regulatory Level (mg/l)
Arsenic	D004	5.0
Barium	D005	100.0
Cadmium	D006	1.0
Chromium	D007	5.0
Lead	D008	5.0
Mercury	D009	0.2
Selenium	D010	1.0
Silver	D011	5.0
Endrin	D012	0.02
Lindane	D013	0.4
Methoxychlor	D014	10.0
Toxaphene	D015	0.5
2,4-D	D016	10.0
2,4, 5-TP	D017	1.0
Benzene	D018	0.5
Carbon Tetrachloride	D019	0.5
Chlordane	D020	0.03
Chlorobenzene	D021	100.0
Chloroform	D022	6.0
o-Cresol	D023	200.0
m-Cresol	D024	200.0
p-Cresol	D025	200.0
Cresol	D026	200.0
1,4 Dichlorobenzene	D027	7.5
1,2 Dichloroethane	D028	0.5
1,1 Dichloroethylene	D029	0.7
2,4 Dinitrotoluene	D030	0.13
Heptachlor	D031	0.008
Hexachlorobenzene	D032	0.13
Hexachlor 1,3-butadiene	D033	0.5
Hexachloroethane	D034	3.0
Methyl Ethyl Ketone	D035	200.0
Nitrobenzene	D036	2.0
Pentachlorophenol	D037	100.0
Pyridine	D038	5.0
Tetrachloroethylene	D039	0.7
Trichloroethylene	D040	0.5
2,4,5-Trichlorophenol	D041	400.0
2,4,6-Trichlorophenol	D042	2.0
Vinyl Chloride	D043	0.2

Picture #:
P7250120
Date: July
25, 2013
Time: 2:19
p.m.
Photograph
er: Sue
Brauer
Location:
OHD 987
035 326,
conference
room
Subject:
Fourth page
copied from
"Waste
Disposal"



I completed checklists for the Zinc Initiative Focus Area, LQG Generator Requirements, LQG Generator Land Disposal Requirements and Small Quantity Universal Waste Handler Requirements. The checklists are Attachment D.

Closing Conference

The exit interview started at 4:00 p.m. I identified the following issues.

1. Universal waste lamps are required to be contained in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Universal waste lamps were not contained by the packaging at Twist Inc.
2. An employee hired in August 2012 had not received RCRA training by July 2013, over six months after starting.

3. The contingency plan requires updating to name current employees as emergency coordinators.
4. Used oil buckets were not labeled "Used Oil."



Attachments

- A. Business Cards
- B. Plant Diagrams
- C. Personnel Training
- D. Checklists
- E. Documents Copied

ATTACHMENT A

Business Cards

SPRING SPECIALISTS **TWIST**
inc.

p.o. box 177 jamestown, ohio 45335

Steve Burnham
Safety Director

Telephone - (937) 675-9581
Fax - (937) 675-6781
E-mail - sburnham@twistinc.com
<http://www.twistinc.com>

SPRING SPECIALISTS **TWIST**
inc.

Josh Hartman
Process Engineer

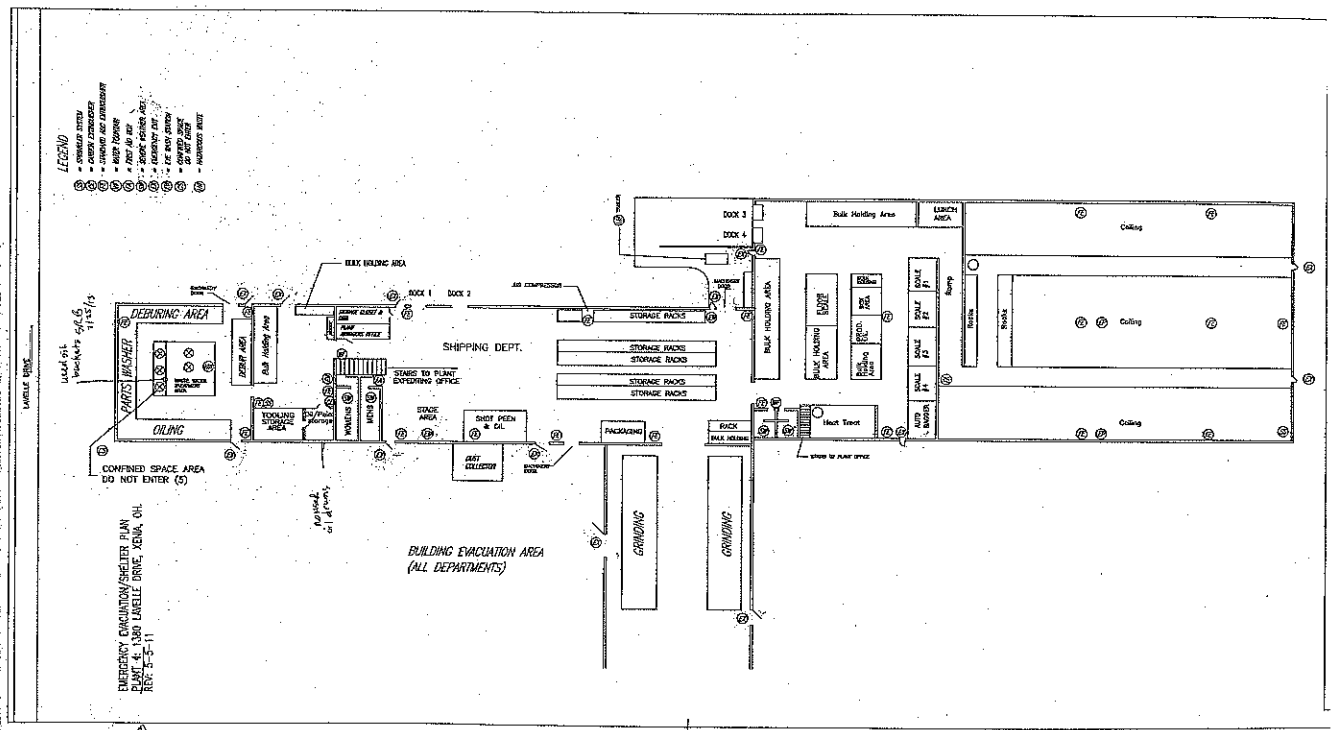
E-mail - jhartman@twistinc.com
<http://www.twistinc.com>

Shipping: 1360 Lavelle Drive
Mailing: P.O. Box 356
Xenia, OH 45385

Phone - (937) 675-9581
Fax - (937) 376-0795

ATTACHMENT B

Plant Diagrams



EMERGENCY EVACUATION/SHELTER PLAN
PLANT #6 1360 LAVELLE DRIVE, XENIA, OHIO

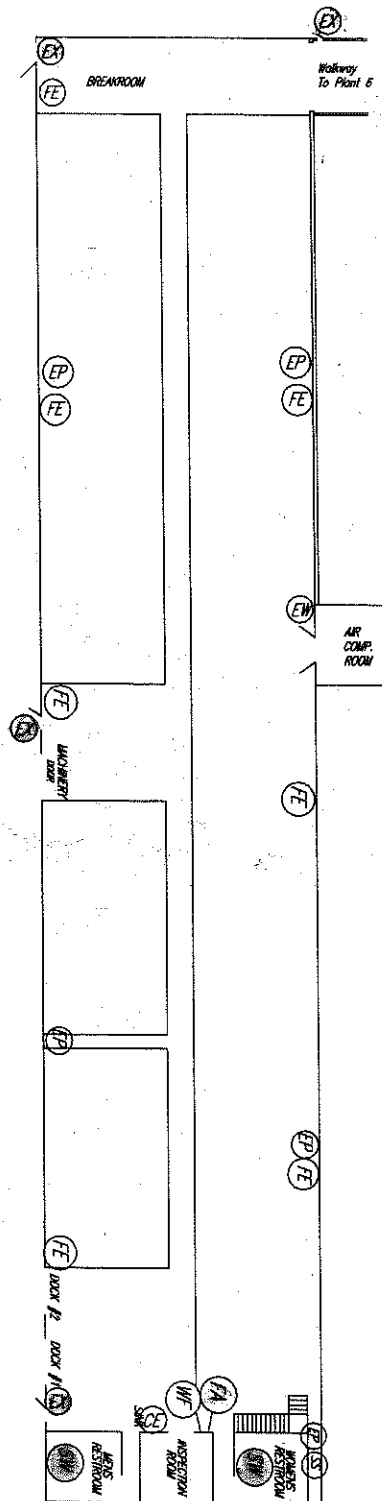
11-11-09

SQUARE FOOTAGE 21,000

LEGEND

- (SS) = SPRINKLER SYSTEM
- (CE) = CARBON EXTINGUISHER
- (FE) = STANDARD ABC EXTINGUISHER
- (WF) = WATER FOUNTAIN
- (FA) = FIRST AID BOX
- (SW) = SEVERE WEATHER AREA
- (EX) = EMERGENCY EXIT
- (EW) = EYE WASH STATION
- (CS) = CONFINED SPACE DO NOT ENTER
- (EP) = ELECTRIC PANEL

BUILDING EVACUATION AREA
(ALL DEPARTMENTS)



1. IN THE EVENT OF AN EMERGENCY DUE TO FIRE OR OTHERWISE, IMMEDIATELY NOTIFY YOUR SUPERVISOR. YOUR SUPERVISOR WILL ASSESS THE SITUATION AND IF NECESSARY WILL ANNOUNCE THE EVACUATION OVER THE PAGER SYSTEM AND CALL 911 FOR EMERGENCY ASSISTANCE.

2. EMPLOYEES MUST LEAVE THE BUILDING THROUGH THE EXIT DOORS CLOSEST TO THEIR WORK AREA. AFTER EXITING THE BUILDING, ALL EMPLOYEES ARE TO ASSEMBLE IN THE BUILDING EVACUATION AREA. IN DOING SO, YOU MUST MAINTAIN A SAFE DISTANCE FROM THE BUILDING. PROMPTLY NOTIFY YOUR SUPERVISOR TO CONFIRM YOUR PRESENCE AND TO RECEIVE FURTHER INSTRUCTIONS. FOR YOUR CONVENIENCE THESE EXITS ARE DESIGNATED WITH THE SYMBOL (EX) ON THIS LAYOUT AND ARE HIGHLIGHTED IN YELLOW.

3. IN CASE OF SEVERE WEATHER SUCH AS A TORNADO OR HIGH WINDS, ALL EMPLOYEES WILL BE INSTRUCTED TO GO TO ONE OF THE DESIGNATED SHELTER AREAS WITHIN THE PLANTS. THESE AREAS ARE DESIGNATED WITH THE SYMBOL (SW) ON THIS LAYOUT AND ARE HIGHLIGHTED IN BLUE FOR YOUR CONVENIENCE.

Josh
Hartman

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ATTACHMENT C

Personnel Training

TRAINING REPORT

CompletedTrain Code: HWM
Description: HAZARDOUS WASTE MANAGEMENT.

Location	Dept.	Emp #	Name	Start Date	Classification	Level	Date Completed
1	1F	888	DAY, KEVIN L.	11/13/2000	ASSEMBLY 2011	2.40	10/25/2011
1	1N	236	KEPLER, CHRISTOPHER L.	04/17/1989	CELL LEADER 2011	2.20	12/10/2009
1	M	1164	DILLON, JAMES T.	04/19/2004			12/22/2011
2	2O	1529	LEE, AMY R.	10/16/2006	NONE	0.00	12/19/2011
2	2P	64	CURTIS, VANESSA	05/15/1989	PAINT 2011	2.20	12/11/2008
2	2P	106	SHAW, RHONDA J.	09/13/2010	PAINT 2011	2.00	10/25/2011
2	2P	218	QUEEN, CONNIE R.	07/19/1983	PAINT 2011	2.20	10/25/2011
2	2P	1159	SHOOK, TIMOTHY A.	04/05/2004	CELL LEADER 2011	3.10	12/09/2009
2	2P	1252	GRAHAM, TINA M.	10/25/2004	NONE	0.00	12/11/2008
2	2P	1628	BROWN, BARBARA J.	01/03/2011	PAINT 2011	2.20	10/25/2011
2	2P	1692	MCCLELLAN, BLAKE A.	08/23/2011	PAINT 2011	2.00	07/25/2013
2	2P	1700	RICHARDSON, JAMES R.	11/01/2010	PAINT 2011	2.20	10/25/2011
2	2P	1709	WIEDENHEFT, DONNA L.	01/24/2011	NONE	0.00	12/19/2011
2	2P	1734	PORTER, JR., GERALD M.	08/29/2011	PAINT 2011	2.20	12/19/2011
2	2P	1738	LAMKA, ROBERT B.	10/03/2011	PAINT 2011	2.20	12/19/2011
2	2P	1744	TEST, JARRETT B.	11/14/2011	NONE	0.00	12/19/2011
2	2P	1758	OGG, KELLY A.	04/30/2012	PAINT 2011	2.00	07/25/2013
3	3C	1184	SONNYCALB II, MARK A.	06/01/2004	AUTOMATIC COILING 2011	3.00	12/13/2011
3	3G	1280	WILLIS, DENISE R.	01/31/2005	GENERAL MACHINE LABOR 2011	2.00	05/29/2012
3	M2	844	LONG, JAMES A.	06/26/2000	BUILDING MAINTENANCE 2011	2.00	12/22/2011
3	PM	216	TRUBEE, PHILLIP	04/24/1978			12/10/2009
4	4FI	321	THORNTON, TERESA L.	07/06/1992	SHIPPING/HANDLER 2011	2.20	12/10/2009
4	4FI	618	TYREE, CHADWICK S.	10/06/2008	FINISHING 2011	2.40	12/10/2009
4	4FI	1461	SEYMOUR, TIMOTHY D.	06/12/2006	CELL LEADER 2011	2.10	12/10/2009
4	4SP	333	GILLLAUGH, JAMES J.	10/19/1992	SHIPPING/HANDLER 2011	2.40	12/10/2009
4	4TR	572	PREIBISCH, NEIL D.	03/21/2011	NONE	0.00	10/25/2011
4	4TR	1647	PAGE, SHAWN D.	06/23/2008	NONE	0.00	12/10/2009
4	4TR	1648	DORSTEN, DALE A.	06/30/2008	NONE	0.00	12/10/2009
5	EST	301	PRINTZ, WILLIAM W.	10/01/2001			12/19/2011
5	M	31	ANDERSON, PAUL	07/17/1972			12/22/2011
5	M	1720	BROWN, MICHAEL L.	03/21/2011	BUILDING MAINTENANCE 2011	2.20	10/25/2011
5	QC	1572	JACKSON, SHANNON M.	12/07/2009		0.00	10/25/2011
6	6PL	259	GARMAN, CHARLES	04/26/1973	CELL LEADER 2011	4.20	12/09/2009
6	6PL	✓ 319	DAWES, GUY D.	09/14/1992	CELL LEADER 2011	4.20	12/09/2009
6	6PL	327	JACKS, KELLY J.	09/28/1992	PLATING 2011	2.40	12/09/2009
6	6PL	385	ZEHRING, JAMIE L.	09/19/1994	SHIPPING/HANDLER 2011	2.40	12/09/2009
6	6PL	393	SHAW, RUSSELL K.	11/28/1994	PLATING 2011	2.40	12/11/2008
6	6PL	956	MOSTELLER, JOHN H.	03/18/2002	PLATING 2011	2.40	12/09/2009
6	6PL	1026	HENDERSON, JEREMY S.	11/18/2002	NONE	0.00	12/09/2009
6	6PL	1102	PITTMAN, DONALD L.	11/17/2003	PAINT 2011	2.40	12/11/2008
6	6PL	✓ 1177	ABLES, JOSHUA T.	08/09/2004	PLATING 2011	4.00	12/09/2009
6	6PL	1208	COOPER, TINA M.	07/06/2004	PLATING 2011	2.40	12/09/2009

✓ 1780 Hartman, Josh

✓ Bennett, David

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signs manifests

signs manifests

EMPLOYEE TRAINING REPORT
-----Location: 6
Dept: 60Clock #: 1780
Classification:

HARTMAN, JOSHUA R.

Level: 0.00

Training Code	Description Note	Entry Date Entered BY
FEO	FULL EMPLOYEE ORIENTATION 8/6/12	08/10/2012 frank
FO	FORKLIFT OPERATING Recert Due 1/10/16 Passed 1/10/13, 100%/90%	01/10/2013 aaron
HC	HAZARDOUS COMMUNICATION 8/6/12	08/10/2012 frank
OS	ORIENTATION AND GENERAL SAFETY Initial Certification 8/6/12	08/10/2012 frank
PEP	PRE-EMPLOYMENT PHYSICAL 8/6/12	08/10/2012 frank

2.12 Supervisor

- Responsible for wastewater pretreatment system

2.14 Maintenance Personnel

- Maintenance personnel provide labor for spills and handling waste

EMPLOYEE TRAINING REPORT

Location: 6
Dept: 6PL

Clock #: 1177 ABLES, JOSHUA T.
Classification: PLATING 2011

Level: 4.00

lab technician

Training Code	Description Note	Entry Date Entered BY
BC	BASIC COMPUTER INTRODUCTION	
BCLS	BAR CODE LABELING SYSTEM	
BQ	BASIC QUALITY AWARENESS	08/17/2004 glenda
FE	FIRE EXTINGUISHER CERTIFIED ANNUALLY Conducted 11/15/11	11/15/2011 aaron
FEO	FULL EMPLOYEE ORIENTATION	02/22/2006 glenda
FO	FORKLIFT OPERATING RECERT DUE 06/08/2012 RECERTIFIED 06/08/09 98% FORKLIFT 04/19/2006	07/08/2009 frank
HC	HAZARDOUS COMMUNICATION UPDATE COMPLETED 10/14/2008 INITIAL TRAINING 05/17/2004	03/05/2009 glenda
HWM	<u>HAZARDOUS WASTE MANAGEMENT.</u> CERTIFIED ANNUALLY MODULE A & B 12/8/11 12/18/12	<u>07/25/2013 frank</u>
JA	JOB APPROVAL PROCESS	
OS	RIENTATION AND GENERAL SAFETY PLATING ORIENTATION COMPLETED 05/17/2004	08/17/2004 glenda
PEP	PRE-EMPLOYMENT PHYSICAL	08/17/2004 glenda
PM	PREVENTATIVE MAINTENANCE	03/07/2007 glenda
POWER	POWER OUTAGE CONTAINMENT 1/4/10	11/08/2010 frank
RT	ROUTING TICKETS 100% 02/21/2007 INTRO COMPLETED 05/17/2004	02/21/2007 glenda
SI	SKID IDENTIFICATION 100%	08/02/2007 glenda
WO	WORKPLACE ORGANIZATION	08/17/2004 glenda

EMPLOYEE TRAINING REPORT
-----Location: 6
Dept: PMClock #: 253
Classification:

BENNETT, DAVID I.

Level: 0.00

Training Code	Description Note	Entry Date Entered BY
BB	BASIC BLUEPRINT STRUCTURE 92%	11/17/2005 glenda
BC	BASIC COMPUTER INTRODUCTION	11/17/2005 glenda
FE	FIRE EXTINGUISHER CERTIFIED ANNUALLY Conducted 11/15/11	11/15/2011 aaron
FO	FORKLIFT OPERATING RECERTIFICAION DUE 2012 RECERTIFIED 11/09/09 RECERTIFIED 06/20/2003 90% FORKLIFT 09/20/1996 95% ELECTRIC LIFT 04/12/1994 RECERTIFICATION DUE 2006	11/09/2009 frank
HC	HAZARDOUS COMMUNICATION UPDATE COMPLETED 10/14/2008 UPDATE COMPLETED 10/18/2002	03/05/2009 glenda
HWM	<u>HAZARDOUS WASTE MANAGEMENT</u> <u>CERTIFIED ANNUALLY</u> MODULES A & B 12/8/11	<u>12/08/2011 frank</u>
LT	LOCKOUT/TAGOUT RECERTIFIED 5/3/12 90% 05/28/1998 RECERTIFIED 12/06/2005 100%	05/03/2012 aaron
MT	MEASUREMENT TOOL 94%	11/17/2005 glenda
PE	PRE-EMPLOYMENT TESTING MECH APPT: 46 NUM ABIL: 31 NUM REASON: 12 SYM REASON: 13	11/17/2005 glenda
POWER	POWER OUTAGE CONTAINMENT 11/4/10	11/05/2010 frank

EMPLOYEE TRAINING REPORT

Location: 6 Clock #: 319 DAWES, GUY D.
 Dept: 6PL Classification: CELL LEADER 2011

Level: 4.20

Training Code	Description Note	Entry Date Entered BY
BB	BASIC BLUEPRINT STRUCTURE 98%	10/08/1998 glenda
BC	BASIC COMPUTER INTRODUCTION	10/08/1998 glenda
BCLS	BAR CODE LABELING SYSTEM	06/16/2005 glenda
BQ	BASIC QUALITY AWARENESS	11/13/1998 glenda
CC	CORRELATION CHART 95%	10/08/1998 glenda
FA	FIRST AID BLOODBORNE PATHOGEN TRAINING 11/18/11 C P R / A E D TRAINING 11/18/11 FIRST AID TRAINING 11/18/11	11/22/2011 aaron
FE	FIRE EXTINGUISHER CERTIFIED ANNUALLY Conducted 11/15/11	11/15/2011 aaron
FEO	FULL EMPLOYEE ORIENTATION	09/13/1999 glenda
FO	FORKLIFT OPERATING RECERTIFICATION DUE 2012 RECERTIFIED 11/09/2009 96% FORKLIFT 02/03/1998 92% - ELE. LIFT 02/03/1998	11/09/2009 frank
HC	HAZARDOUS COMMUNICATION UPDATE COMPLETED 10/15/2008 UPDATE COMPLETED 10/17/2002 INITIAL TRAINING 05/25/1993	03/05/2009 glenda
HWM	<u>HAZARDOUS WASTE MANAGEMENT.</u> CERTIFIED ANNUALLY MODULE A 12/19/11 12/18/12	<u>07/25/2013 frank</u>
LT	LOCKOUT/TAGOUT RECERTIFIED 5/3/12 12/06/2005 90% 100% 05/28/1998	05/03/2012 aaron
MT	MEASUREMENT TOOL 91%	10/08/1998 glenda

EMPLOYEE TRAINING REPORT
-----Location: 6
Dept: 6PLClock #: 319 DAWES, GUY D.
Classification: CELL LEADER 2011

Level: 4.20

Training

Code	Description Note	Entry Date Entered BY
OS	RIENTATION AND GENERAL SAFETY PLATING ORIENTATION 02/26/2003	02/26/2003 glenda
PE	PRE-EMPLOYMENT TESTING MECH APPT: 46 NUM ABIL: 29 NUM REASON: 9 SYM REASON: 3	11/05/1998 glenda
PEP	PRE-EMPLOYMENT PHYSICAL	10/08/1998 glenda
PM	PREVENTATIVE MAINTENANCE	03/07/2007 glenda
POWER	POWER OUTAGE CONTAINMENT 11/4/10	11/05/2010 frank
RT	ROUTING TICKETS 100%	06/08/2001 glenda
SI	SKID IDENTIFICATION 100%	07/18/2007 glenda
WO	WORKPLACE ORGANIZATION	11/13/1998 glenda

CBT

Job Descriptions
are in my locked
drawer. SRB

[illegible]

ATTACHMENT D

Checklists

7/25/2012

EPA ID No. OHD 987 035 326

TWIST, INC

1380 Lavelle Drive

Xenia, OH 45385

Focus Areas

A few areas where inspectors may want to focus while performing an inspection (or requesting information in a RCRA Section 3007 information request):

1. Is the company claiming the zinc secondary materials exclusion for hazardous secondary materials? If so, obtain a copy of their notification to the state agency or EPA regional administrator and verify compliance with requirements 1-8 of Table 2. No
2. If the company is a generator sending their secondary materials to an intermediate handler or fertilizer manufacturer, verify that the intermediate handler or fertilizer manufacturer is located in an authorized state or an adopted with authorization pending state. *Not applicable*
3. Does the secondary hazardous material contain appreciable amounts of zinc? The parties should be able to provide information showing that the zinc recovery is legitimate. *not applicable - being disposed.*

RCRA Historical Case Documents (Attachment 2)

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES <i>not accumulated vehicles emergency lighting etc. to render</i>			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE THERMOSTATS <i>30-40 year old bldg.</i>			

14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]			
a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS				
18.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
19.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.				
20.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

ACCUMULATION TIME		
21.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
22.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: <i>bot loading dated 4/17-11 & 12/19/12</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
23.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] <i>Steve Burnham</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
25.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
26.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EXPORTS		

33.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)] <i>at Jamestown facility of Twist</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] <i>wastewater treatment on-site</i>			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
MANIFEST REQUIREMENTS				
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]				
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]				
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.				
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.				
PERSONNEL TRAINING				
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:			
a.	Job titles? [3745-65-16D(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

b.	Job descriptions? [3745-65-16D(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] <i>Dave Bennett left in 2012; need to replace</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>office - no since specific to this plant</i>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>re. Bennett</i>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system ? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] <i>no sprinklers in plating shop due to corrosion concrete construction</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/> <i>offices manufacturing</i>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)] <i>mostly filter press cake</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] <i>DEPA inspector required documentation of trailer area storage area closure</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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Transporter brings them.

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**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

- | | | |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

- | | | |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

- | | | |
|----|---|---|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>additional D-codes</i> |
|----|---|---|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

- | | | |
|----|---|--|
| 7. | Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE If "Yes" see question #16.

- | | | |
|-----|---|--|
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] <i>within past 3 years</i> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTIFICATION FORM

- | | | |
|-----|---|--|
| 11. | Does the LDR Notification form contain the following information: | |
| a. | Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
----	---	--

NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

12.	Is the HW treated by burning? If "No" go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? <i>not by generator</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.		Was the HW treated by wastewater treatment? <i>generated by WW</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code and contain $\geq 10\%$ TOC? <i>select paint wastes may be yes</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM FOR GENERATOR TREATMENT			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270- 09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-70-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ATTACHMENT E

Documents Copied

Heritage-Crystal Clean, LLC Invoice

Page 1 of 1

Billing Inquiries: (877) 938-7948
custserv@crystal-clean.com

Remit to:
13621 COLLECTIONS
CENTER DRIVE
CHICAGO, IL 60693-0136



Service Location: DAYTON
PO No.:
Service Agreement: **RECEIVED OCT 22 2012** 540944
Release Info:

Invoice No: 12254847
Date Issued: 10/18/2012
Account No: 60209
Item Total: \$256.50
Pre-paid Amount: \$0.00
Current Charges: \$256.50
Previous Amount Due: \$712.58
Total Due: \$969.08
Subject to finance charges if payment not received by 11/17/12

|||||
TWIST, INC.
ATTN: RICHARD TRACY
P.O. BOX 177
JAMESTOWN, OH 45335-0177

Svc Dt	Work Order	Product Description / Comment	Equip	Qty	Unit Price	Tax Amt	Total Cost
10/18/12	00-0055RYR	OILY WATER		342	\$0.75	\$0.00	\$256.50
271444							

This form (invoice) is deemed part of the above referenced Service Agreement between Heritage-Crystal Clean, LLC and the identified customer and all terms and conditions and certifications contained therein are deemed a part hereof.

Item Total: \$256.50

TO ENSURE PROPER CREDIT PLEASE INCLUDE THIS PORTION WITH YOUR PAYMENT

Heritage-Crystal Clean Remittance

Current Charges:

\$256.50

Invoice Number:

12254847

TWIST, INC.
4989 COTTONVILLE ROAD
JAMESTOWN, OH 45335

Total Amt Due:

\$969.08

Amount Enclosed:

Account Number:

60209

Change of Address ?
Check box and complete other side. ☐

Payment Due Upon Receipt

PO Number:

Payment by Mastercard, Visa, and
American Express available.
Check box and complete other side. ☐

Remit to:

|||||
HERITAGE CRYSTAL CLEAN, LLC
13621 COLLECTIONS CENTER DRIVE
CHICAGO, IL 60693-0136

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Heritage-Crystal Clean, LLC Invoice

Page 1 of 1

Billing Inquiries: (877) 938-7948

custserv@crystal-clean.com

Remit to:

13621 COLLECTIONS
CENTER DRIVE
CHICAGO, IL 60693-0136



Service Location: **DAYTON**
PO No.: **63329**
Service Agreement: **540944**
Release Info: **RECEIVED NOV 26 2012**



TWIST, INC.
ATTN: RICHARD TRACY
P.O. BOX 177
JAMESTOWN, OH 45335-0177

Invoice No: **12289391**
Date Issued: **11/16/2012**
Account No: **60209**
Item Total: **\$514.72**
Pre-paid Amount: **\$0.00**
Current Charges: **\$514.72**
Previous Amount Due: **\$698.82**
Total Due: **\$1,213.54**
Subject to finance charges if payment not received by 12/16/12

Svc Dt	Work Order	Product Description / Comment	Equip	Qty	Unit Price	Tax Amt	Total Cost
11/16/12	00-0057HRL	OILY WATER		584	\$0.83	\$0.00	\$484.72
11/16/12	00-0057HRL	TRUCK CHARGES		1	\$30.00	\$0.00	\$30.00

This form (invoice) is deemed part of the above referenced Service Agreement between Heritage-Crystal Clean, LLC and the identified customer and all terms and conditions and certifications contained therein are deemed a part hereof.

Item Total: **\$514.72**

TO ENSURE PROPER CREDIT PLEASE INCLUDE THIS PORTION WITH YOUR PAYMENT

Heritage-Crystal Clean Remittance

Current Charges:

\$514.72

Invoice Number:

12289391

TWIST, INC.
4989 COTTONVILLE ROAD
JAMESTOWN, OH 45335

Total Amt Due:

\$1,213.54

Amount Enclosed:

Account Number:

60209

Change of Address ? ☐
Check box and complete other side.

Payment Due Upon Receipt

PO Number:

63329

Payment by Mastercard, Visa, and
American Express available. ☐
Check box and complete other side.

Remit to:



HERITAGE CRYSTAL CLEAN, LLC
13621 COLLECTIONS CENTER DRIVE
CHICAGO, IL 60693-0136



Heritage-Crystal Clean, LLC Invoice

Page 1 of 1

Billing Inq: (877) 938-7948
custserv@crystal-clean.com

Remit to:
13621 COLLECTIONS
CENTER DRIVE
CHICAGO, IL 60693-0136



Service Location: **DAYTON**
PO No.: **65174**
Service Agreement: **540944**
Release Info:

Invoice No: **12469177**
Date Issued: **04/25/2013**
Account No: **60209**
Item Total: **\$448.20**
Pre-paid Amount: **\$0.00**
Current Charges: **\$448.20**
Previous Amount Due: **\$0.00**
Total Due: **\$448.20**
Subject to finance charges if payment not received by 05/25/13



TWIST, INC.
ATTN: RICHARD TRACY
P.O. BOX 177
JAMESTOWN, OH 45335-0177

Svc Dt	Work Order	Product Description / Comment	Equip	Qty	Unit Price	Tax Amt	Total Cost
04/25/13	00-005J7LC	OILY WATER		540	\$0.83	\$0.00	\$448.20

RECEIVED
4-29-13

This form (invoice) is deemed part of the above referenced Service Agreement between Heritage-Crystal Clean, LLC and the identified customer and all terms and conditions and certifications contained therein are deemed a part hereof.

Item Total: **\$448.20**

TO ENSURE PROPER CREDIT PLEASE INCLUDE THIS PORTION WITH YOUR PAYMENT

Heritage-Crystal Clean Remittance

Current Charges:

\$448.20

Invoice Number:

12469177

TWIST, INC.
4989 COTTONVILLE ROAD
JAMESTOWN, OH 45335

Total Amt Due:

\$448.20

Amount Enclosed:

Account Number:

60209

Change of Address ? ☐
Check box and complete other side.

Payment Due Upon Receipt

PO Number:

65174

Payment by Mastercard, Visa, and
American Express available. ☐
Check box and complete other side.

Remit to:

HERITAGE CRYSTAL CLEAN, LLC
13621 COLLECTIONS CENTER DRIVE
CHICAGO, IL 60693-0136

p. 52



USA LAMP & BALLAST RECYCLING, INC

7806 Anthony Wayne Blvd
Cincinnati, OH 45216
513.641.4155 phone, 513.641.4156 fax

UNIVERSAL WASTE

BILL OF LADING

Number: 57877

Customer Name: Becker Electric Supply - Dayton, OH	Generator Name: Twist
Customer Address: 1341 East 4th Street	Generator Address: 1380 Lavella Drive
Customer City/State/Zip: Dayton OH 45402	Generator City/State/Zip: Xenia OH 45385
Customer Phone: (513) 771-2550	Generator Phone:
Shipping Or PO#: PO #: 1427403	Emergency Contact: CHEMTREC
Date: 12/19/12	Phone #: 800-424-9300
Driver Time On Site: TIME IN: 12:00	TIME OUT:
<input checked="" type="checkbox"/> PICKUP <input type="checkbox"/> DELIVERED	

QTY	HM	HAZARDOUS MATERIAL TO BE RECYCLED	COMMENTS / DESCRIPTION
		Lighting Ballast (Lbs) RQ, UN3432, Polychlorinated biphenyls, solid, 9, PGIII	
		Mercury Devices (Lbs) RQ, UN2809, Mercury, 8, PGIII	
		Batteries (Lbs) UN3028, Batteries, Dry, containing Potassium Hydroxide, Solid, 8, PGIII	
		Batteries (Lbs) UN2794 or UN2795, Batteries, Wet, filled with Acid or Alkali, 8, PGIII	
		Batteries (Lbs) UN3090, Lithium Batteries, 9, PGII	
		Batteries (Lbs) Batteries, Dry, Sealed; n.o.s.	
		Other Qty Each or Weight Lbs	
USED ELECTRIC LAMPS FOR RECYCLING			
		Fluorescent 4ft and under Lamps	1 Ballot moved Bulbs
		Fluorescent 5ft and over Lamps	
		Fluorescent Compacts Lamps	
		U Shape and Circular Lamps	
		HID (High Intensity Discharge) Lamps	
		Incandescent Lamps	
		Other Lamps - describe:	
		Computer / Electronic Equipment Qty Each or Weight Lbs	
		Computer / Electronic Equipment Qty Each or Weight Lbs	
Containers Delivered	4ft Boxes _____ 8ft Boxes _____	55 gallon drums _____ 5 gallon pails _____	Labels _____ Crates _____ Gaylords _____ Other _____

RECEIVED, subject to the classifications and regulations in effect on the date of the issue of this Bill of Lading the property described in apparent good order except as noted (exact condition of contents of packages unknown). RECEIVED, subject to the terms and conditions of USA Lamp & Ballast Recycling, Inc Quotation, Conditions Agreement or Contract for Services. Transportation Charge per quotation and /or Agreement will apply.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

The packages contain the materials as described and do not contain any non-described material. If containers received at the processing facility are found to have other than previously represented materials as listed above, additional charges may be requested.

Customer or Generator Authorized Signature:

USA Lamp & Ballast Recycling, Inc Accepted:

Date:

